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September 12, 2023

VIA ECF

The Honorable Katherine Polk Failla
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Room 2103
New York, NY 10007

Re: *Huzhou Chuangtai Rongyuan Investment Management Partnership, et al. v. Hui Qin*, Case No. 21 Civ. 9221 (KPF)

Dear Judge Failla:

This letter is submitted jointly on behalf of counsel for Petitioners and Respondent. The parties have continued to negotiate an ESI Stipulation, including exchanging further redlined drafts of the ESI Stipulation.

Circumstances beyond either party's control have taken time away from the negotiation process to submit the ESI Stipulation by today's extended deadline. Accordingly, the parties respectfully request that the deadline for submitting an ESI Stipulation be extended to September 14, 2023 in order to allow additional time for the parties to address issues related to the ESI Stipulation.

Respectfully submitted,

/s/ Hugh M. Ray, III
Hugh M. Ray, III

cc: All counsel of record (via ECF)